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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

Richard Kadrey, et al.,

Plaintiff,

v.

Meta Platforms, Inc.,

Defendant.

Case No.: 23-CV-3417-VC

**ENTREPRENEUR MEDIA, LLC'S  
CORRECTED ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
CASES SHOULD BE RELATED  
PURSUANT TO CIVIL LOCAL RULES  
3-12 AND 7-11**

1 This corrected filing substitutes the accurate case number – 3:25-cv-09579-BLF – for the  
 2 Entrepreneur action. The prior version inadvertently listed the number as 3:25-cv-03579-BLF. No  
 3 other changes have been made.

4 **TO THE COURT AND ALL PARTIES AND THEIR COUNSEL OF RECORD:**  
 5 **PLEASE TAKE NOTICE** that pursuant to Civil Local Rules 3-12 and 7-11 of the Northern  
 6 District of California, Plaintiff Entrepreneur Media, LLC (“Entrepreneur”) files this  
 7 administrative motion to consider whether *Entrepreneur Media, LLC v. Meta Platforms, LLC*,  
 8 5:25-CV-9579-BLF should be related to *Kadrey, et al. v. Meta Platforms, Inc.*, 23-CV-3417-VC.  
 9 Counsel for Meta Platforms, Inc. (“Meta”) has informed Entrepreneur that Meta does not oppose  
 10 this administrative motion. *See* Declaration of Moez M. Kaba ¶ 4.

11 Civil Local Rule 3-12(b) provides: “Whenever a party knows or learns that an action, filed  
 12 in or removed to this district is (or the party believes that the action may be) related to an action  
 13 which is or was pending in this District as defined in Civil L.R. 3-12(a), the party must promptly  
 14 file in the lowest-numbered case an Administrative Motion to Consider Whether Cases Should Be  
 15 Related.” Civ. L.R. 3-12(b). Actions are related to another when “(1) [t]he actions concern  
 16 substantially the same parties, property, transaction or event; and (2) it appears likely that there  
 17 will be an unduly burdensome duplication of labor and expense or conflicting results if the cases  
 18 are conducted before different Judges.” Civ. L.R. 3-12(a).

19 Entrepreneur now files this motion in the lower-numbered action. Entrepreneur does not  
 20 seek to consolidate the two actions under FRCP 42, as Entrepreneur is situated differently than  
 21 *Kadrey* plaintiffs as a corporate published of book and periodicals, rather than individual authors,  
 22 and because of the differences between the respective parties’ potential damages theories.  
 23 However, Entrepreneur has reason to believe *Entrepreneur Media, LLC v. Meta Platforms, LLC*,  
 24 5:25-CV-9579-BLF is related to the *Kadrey* matter before Judge Chhabria. The two matters  
 25 involve the same defendant and arise from the same events: (1) Meta’s illegal download of  
 26 copyrighted works contained in shadow libraries, and (2) Meta’s use of those works to train large  
 27 language models. Because Judge Chhabria has familiarized himself with Meta’s alleged

1 misconduct, including by resolving dispositive motions addressing the same alleged misconduct,  
2 conducting this case before a different judge would likely create an unduly burdensome  
3 duplication of labor.

4 Accordingly, Entrepreneur respectfully requests that the Court related *Entrepreneur*  
5 *Media, LLC v. Meta Platforms, LLC*, 5:25-CV-9579-BLF and *Kadrey, et al. v. Meta Platforms,*  
6 *Inc.*, 23-CV-3417-VC.

7  
8 Dated: November 18, 2025

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10 By: 

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